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March 6, 2014

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

Re: Expression of Interest – Rural Broadband Experiments
Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

This letter is to express the Waterford Foundation's interest in participating in the Rural Broadband Experiments announced at the FCC Open Meeting on January 30. There is a great need for high-speed Internet service for the community and residents of Waterford, Virginia and surrounding rural, unserved areas. We request that the Federal Communications Commission consider our area's need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

Background

The village of Waterford, Virginia has a remarkable history. Originally a Quaker settlement dating back to 1733, Waterford is a rare, intact example of a late 18th and early 19th century rural village surrounded by its historic farmland. Its significance rests on the almost pristine appearance of the village and surrounding countryside. Located along the Catoctin River, Waterford was once a bustling area with multiple operating mills at the center of the surrounding farming communities.

The nonprofit Waterford Foundation, founded in 1943, is one of America's first community-based historic preservation organizations. Our mission is to preserve the historic buildings and open spaces of Waterford, and, through education, to increase the public's knowledge of life and work in an early American rural community.

Thanks to several generations of preservation efforts, today the many public buildings survive, including one of the mills, and villagers live in the preserved homes. In 1970, Waterford was designated in its entirety as a National Historic Landmark District (National Register Number: 69000256). The Commonwealth of Virginia recognizes this same historic district, and the village is also protected by Loudoun County's Waterford Historic and Cultural Conservation District.

Waterford has been bypassed by traditional wireline carriers. We can receive dial-up modem Internet service from home and office telephone lines. While we enjoy a quieter atmosphere in Waterford, the lack of high-capacity, fiber-based broadband services impedes economic development and quality-of-life.

Geographic Territory

Waterford is situated in the Catoctin Valley in the most northern county in the Commonwealth of Virginia. Waterford is seven miles northwest of the Town of Leesburg. A few miles to the north and across the Potomac River is Maryland, and to the west is West Virginia.

Located in rural, western Loudoun County, the rolling hill geography poses challenges of scale to fiber network based deployments and challenges of terrain to wireless broadband technologies. We support deployment of high speed Internet connectivity to the entire area.

Proposed technology

We are aware that only optical fiber provides the backbone capacity needed to effectively transport the continuous, growing demand for Internet use and streaming content. We encourage the FCC to make funds available to alternative providers to deploy a solution that incorporates high-capacity, low unit cost fiber transport to homes and businesses. A hybrid fiber backbone/broadband wireless strategy would likely be the most efficient solution should funds not be available to support all-fiber deployments.

A local firm and subsidiary of the Foundation, Waterford WISP, may be filing an Expression of Interest. This was one of the first entities in Loudoun County to invest in broadband capacity for this rural community, and we would enthusiastically support their efforts.

Existing Providers

Waterford is served or partially served by three private, wireless Internet service providers (WISP):

- Waterford WISP provides basic 1-2 Mbps service in the historic village;
- Loudoun Wireless provides 1-2 Mbps service in northern Loudoun but not in Waterford;
- Roadstar provides 1-2 Mbps service in western and northern Loudoun but not Waterford.

List of Anchor Institutions

Schools: Waterford Elementary, Lovettsville Elementary

Libraries: Lovettsville Public Library

Community Centers: Waterford Foundation auditorium and additional buildings used by the public

Thank you for your consideration of this unique place as you deliberate on resources related to the Rural Broadband Experiments. We commend the FCC in this effort to connect rural communities and we are ready to help close the digital divide.

Sincerely.

Ken Rosenfeld Executive Director